



Date: June 2, 2003

To: Illinois Commerce Commission Staff

From: SBC Illinois

Subject: June 2, 2003 SBC Illinois Report to ICC Staff on Key PMs

This document provides the third monthly report to the Illinois Commerce Commission ("ICC") Staff on Key PMs. Included below is a summary of the current status for each PM SBC Illinois committed to report on to the ICC Staff. On the following pages are updated explanations and statuses for each of the submeasures that continue to be reported (performance has not met or exceeded the standard of comparison for two consecutive months subsequent to January 2003 results).

Sheet Key PM's Summary Table

Performance Measurement	Status	Date
PM 17-01	Open	
PM 37-01	Open	
PM 37-04	Closed	April 1
PM 55-01.1	Open	
PM 55-01.3	Closed	April 1
PM 65.01	Open	
PM 65-06	Open	
PM 65-03	Open	
PM 65-08	Open	
PM 66-03	Closed	April 1
PM 67-03	Closed	April 1

Please direct any comments or questions on this document to SBC Illinois Regulatory Staff, or to Jim Ehr, Director - SBC Midwest Performance Measurements, at (847) 248-4375 or JE2471@SBC.COM.

May 1, 2003

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Issue: Key PMs Requiring Improvement – PM 17-01, Billing Completeness

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:

- 1.1. An issue has been identified where performance on Lineshare orders generated for both SBC's Affiliate and for CLECs has been calculated from a different, later "available for Billing" date and time (the start of the interval calculation) than that used for UNE-P wholesale orders. As a result, several days were excluded from the interval for the Lineshare orders. For these orders, the date and time the order was "available for billing" in CABS was being used as the start point of the interval, instead of the date and time the order is "available for billing" in ACIS. Using the date and time the order is available for billing" in ACIS encompasses the entire billing completion process (ACIS completion in addition to CABS completion).
 - This issue resulted in overstated SBC Affiliate performance results, which predominantly reflect (greater than 90%) Linesharing order activity, while Linesharing is a small subset of wholesale orders. Under the IL Remedy Plan, the parity comparison is made to the better of SBC Affiliate or SBC Retail, and in recent months this overstated performance has resulted in the comparison being made to SBC Affiliate results.
 - SBC Affiliate results in Illinois have consistently been reported as 98-99% bills posted before the first bill cycle for the account after the order is completed in the ordering systems. With the adjustment to use the proper start date and time from ACIS, SBC Affiliate results will be properly reported at a lower rate and the reported results will demonstrate performance that is closer to parity.
- 1.2. The UNE-P and Lineshare order process is serial, not parallel as in other regions.
 - The ACIS order must first update the ACIS CSR (reach ACIS "3U" status) before the CABS order can be generated.
 - The interval for PM 17 is measured from "available for billing" in ACIS (ACIS "3C" status) to CABS posting.
 - The comparison is to either SBC Retail or the SBC Affiliate (SBC Affiliate order Lineshare only) for all order types.
- 1.3. Coincident with implementation of the six-month review changes to disaggregate PM 17, an additional performance reporting issue was identified that has resulted in underreporting of previous wholesale and retail performance on PM 17. Prior to April 2003 results, the incorrect Bill Cycle Date was used in instances where the date of completion of the order in the ordering system was between the Bill Date and the Bill Cycle Date for the account. Orders that complete on or after a Bill Date are not considered for inclusion in the bill cycle associated with that Bill Date, and are appropriately compared to the compared to the following month's Bill Cycle Date (where non-recurring charges and usage resulting from the order would first appear on the account's bill). This issue was addressed for the CABS portion of PM 17 results with April 2003 results going forward, and the ACIS portion of PM 17 results is to be addressed with

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May results reported June 2003 going forward. Results for January through April 2003 will be restated on July 5th.

2. The corrective actions being taken for each of those PMs:

- 2.1. Programming corrections have been implemented to use the proper start date and time for calculation of the interval for wholesale and SBC Affiliate Linesharing orders. The anticipated reduction in reported performance for these orders is expected to impact SBC Affiliate results significantly, while having little to no obvious affect on reported wholesale results. This is reflected in the reports for March 2003, the results for which are provided below.
- 2.2. SBC has proposed in the current Billing PM Collaborative that a grace period for UNE-P orders be added to allow for the serial billing process implemented to address CLEC desires to have all UNE-P billing generated from CABS. With this change, if the first bill cycle after the order becomes "available for billing" is within five days, success will be assessed against the first bill cycle after the 5-day period. The order will not be marked a miss if it is completed in CABS prior to that bill cycle.

3. The schedule for those corrective actions to be completed:

- 3.1. Implementation of the programming changes to use the proper start date and time for wholesale and SBC Affiliate orders occurred with March 2003 results. March 2003 results also reflect the implementation of the 6 Month Review V1.9 changes.
- 3.2. The proposed change to PM 17 Version 1.9 is currently before the CLECs in the Billing PM Collaborative. SBC hopes to reach agreement in June on that proposal, along with the addition of a Billing Completion Notice Timeliness measure.

4. The current and most recent three months of performance results for those measures:

- 4.1. March 2003 results, when the submeasures of PM 17 were initially implemented, show volume that should be reported under the "All Other" submeasure under the "Lineshare" submeasure. SBC Illinois will be restating results for PM 17 for March 2003 to correct this issue, and for January – April 2003 to correct the additional issue discussed in section 1.3 above, on July 7, 2003. Previously reported wholesale performance is expected to be improved and be at or very near parity.

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 17-01				
February	314750	91.13	99.88	No
March				
Lineshare	19519	96.28	94.89	Yes
UNE-P	315310	91.25	91.68	No
Resale	14175	91.01	91.68	No
All Other	76	98.68	91.68	Yes

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April				
Lineshare	4827	98.24	96.46	Yes
UNE-P	311759	95.07	92.97	Yes
Resale	13709	90.41	92.97	No
All Other	16496	98.21	92.97	Yes

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Issue: Key PMs Requiring Improvement – PM 37-01, POTS Residence

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:

- 1.1. The primary cause for reported performance failing to meet the parity standard for both Resold POTS Residence trouble report rates is evident in the performance results for the same disaggregations of PM 37.1. PM 37.1 excludes repeat reports and installation reports, per agreement with the PM collaborative, and is the trouble report rate measure that is subject to remedy. SBC Illinois has consistently met the submeasures of PM 37.1. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of lines. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of lines, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.
- 1.2. Since the ratio of orders to installed lines is significantly higher for wholesale than SBC retail (see table below), it is expected that, assuming parity of installation trouble reports (which is the case; over the past three months all submeasures of PM 35 have been in parity except for one submeasure in one month (23 of 24 results in parity)), the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 37 than on SBC retail results.

<u>February/March/April 2003 Orders Volume versus Installed Base</u>				
		Order Count from PM 35	Installed Line Count from PM 37	Ratio Orders: Lines
POTS – Residence				
	Feb.	6244	15976	0.391
	Mar.	6251	14688	0.426
	April	5173	13982	0.370
Retail POTS Residence				
	Feb.	214892	3301932	0.080
	Mar.	231893	3280294	0.071
	April	239202	3260439	0.073
				ratio 4.8 times greater Feb.
				ratio 6.0 times greater Mar.
				ratio 5.1 times greater April

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2. The corrective actions being taken for each of those PMs:

- 2.1. Even though it is to be expected that installation trouble reports will be proportionately more common in wholesale results for PM 37 than in SBC Retail results, SBC Illinois is providing additional scrutiny to new wholesale service order requests. SBC Illinois will take wholesale service orders identified by the system as no fieldwork, and in key wire centers dispatch out on these orders on the due date early in the day. It is SBC Illinois' expectation that any bad plant condition/facility issues will be cleared on the due date. This preferential treatment for wholesale orders is expected to help offset the expected, proportionately higher number of installation trouble reports included in PM 37, and bring performance closer to, or into, parity with SBC Retail.
- 2.2. PM35-02 was out of parity for the month of February, 2003 due in part to the cessation of dispatching out on the no field work orders in mid-January. SBC Illinois found that the decision to do so was negatively impacting this disaggregation. In mid-March, SBC Illinois resumed testing and dispatching out on no field work orders in key wire centers. PM35-02 was back in parity for March 2003.
- 2.3. SBC Illinois' trouble report rate performance is solid. Among the eight disaggregations of data reported for PM 37 (Trouble Report Rate) and PM 37.1 (Trouble Report Rate Net of Installation and Repeat Reports), Illinois Bell fell short of parity for only PM 37-01 (Trouble Report Rate – Resale POTS Residence).
- 2.4. The Resale POTS Residence trouble report rate typically lies at 1.5% to 3%, yet SBC Illinois has been unable to achieve parity for PM 37-01 (Trouble Report Rate – Resale POTS Residence). The minimal disparity is generally the result of mathematical skewing caused by "I-cases" (i.e., provisioning trouble reports) and other types of reports. Other measures' results demonstrate that SBC Illinois' performance is more accurately portrayed absent this skewing effect. These measures are PM 37.1-01 (Trouble Report Rate Net of Installation and Repeat Reports – Resale POTS Residence), PM 35-01/02 (Percentage Trouble Reports Within 30 Days (I-30) of Installation – Resale POTS Residence – FW/NFW) and PM 41-01 (Percentage of Repeat Reports – Resale POTS Residence). PM 37.1 was developed at the request of the CLEC's from the 2001 PM Collaborative to better reflect the trouble report rate. At that time, the CLEC's agreed to remedies on PM37.1 and to make PM37 diagnostic. PM37.1 mirrors PM37 except for the inclusion of subsequent reports and the exclusion of Installation and Repeat reports. As the table below indicates, the results for each of these submeasures demonstrate parity performance.

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<u>PM</u>	<u>Month</u>	<u>CLEC</u>	<u>AIT</u>	<u>Z-Value</u>	<u>Parity</u>
37-01	February, 2003	2.94	1.64	12.71	NO
37-01	March, 2003	2.73	2.13	4.97	NO
37-01	April, 2003	2.90	2.28	4.89	NO
37.1-01	February, 2003	0.90	1.67	-7.49	YES
37.1-01	March, 2003	1.23	2.22	-8.02	YES
37.1-01	April, 2003	1.52	2.33	-6.31	YES
35-01	February, 2003	4.69	10.01	-7.40	YES
35-01	March, 2003	2.87	10.75	-12.29	YES
35-01	April, 2003	3.82	10.31	-8.08	YES
35-02	February, 2003	5.75	4.70	3.25	NO
35-02	March, 2003	4.50	4.97	-1.35	YES
35-02	April, 2003	4.59	4.99	-1.12	YES
41-01	February, 2003	3.05	10.79	-5.52	YES
41-01	March, 2003	3.23	11.13	-5.22	YES
41-01	April, 2003	3.94	11.86	-4.93	YES

3. The schedule for those corrective actions to be completed:

3.1. The process described above was implemented in March 2003.

4. The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 37-01				
February	15976	2.94	1.64	No
March	14688	2.73	2.13	No
April	13982	2.90	2.28	No

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Issue: Key PMs Requiring Improvement – PM 55-01.1, 2-wire analog (1-10)

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:
 - 1.1. PM 55 measures the average business days from application date to completion date for N, T, and C orders. The PM calls for a parity comparison in Illinois, while the other four SBC Midwest states use a benchmark comparison. An exclusion exists for customer requested due dates beyond the standard interval of “X” business days. However, because in Illinois this measure uses a parity standard, the wholesale exclusion for customer requested due dates beyond the standard interval can only be taken if the exclusion is also applied to retail comparisons. SBC Retail does not apply a standard interval in establishing order due dates, so the exclusion has not been applied.
 - 1.2. Accordingly, reported results include all orders where the CLEC requested a due date beyond the standard interval defined for wholesale. This is because there is no corresponding standard interval for retail orders. When this measure is out of parity, it may simply show that the wholesale data was impacted by a higher percentage of orders with customer requested due dates outside of the 3 day offered interval, or with longer requested due dates, than SBC Retail. If the average installation interval measured in PM 55 was out of parity as a result of inadequate SBC performance, one would expect results for PM 58 (% SBC Caused Missed Due Dates) to also be out of parity. However, performance for the PM 58 submeasure 2-Wire Analog/8 dB Loops (1-10) for both January and February was within parity. Also, when SBC investigated the impact on only counting orders where the CLEC requested the standard offered interval for PM 55-01.1, the average installation interval dropped from 4.79 to 3.26 days for November data.
2. The corrective actions being taken for each of those PMs:
 - 2.1. For PM 55, an Enhancement Request (ER) 587-0403 was implemented for April Data reported on May 20 to only include orders with requested due date of the standard interval on wholesale, and the offered interval (which varies based on force/load management) on SBC Retail. This change reflects more accurate compliance with performance measure definition, business rules, and intent.
3. The schedule for those corrective actions to be completed:
 - 3.1. The ER will be input to the Change Management process and prioritized appropriately. (ER 587-0403 was completed)

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4. The current and most recent three months of performance results for those measures:

- 4.1. As can be seen in the table below, April wholesale performance improved to 3.17 days average installation interval with the implementation of the enhancement to reporting of the PM, and performance was in parity. SBC Illinois expects this performance level to persist.

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 55-01.1				
February	2656	5.13 days	4.45	No
March	3168	4.80 days	4.64	No
April	1684	3.17 days	5.72	Yes

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Issue: Key PMs Requiring Improvement – PM 65-03, Trouble Report Rate – DSL loops – line sharing; PM 65-06, Trouble Report Rate – BRI loop with test access; and PM 65-08, Trouble Report Rate – DS1 loop with test access.

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:

- 1.1. A primary cause for reported performance for PM 65 – Trouble Report Rate submeasures for DSL Loops with Line Sharing, BRI Loops and DS1 Loops that differs from the results reported for the same submeasures of PM 65.1 is that PM 65.1 excludes repeat reports and installation reports. Per agreement with the PM collaborative PM 65.1 is the trouble report rate measure that is subject to remedy. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of circuits. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of circuits, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.
- 1.2. Since the ratio of orders to installed lines is significantly higher for wholesale than SBC Retail (see example for BRI loops in the table below), it is expected that, assuming parity of installation trouble reports (which is the case; over the past three months the BRI Loop submeasure of PM 59 has been in parity each month), the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC Retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 65 submeasures than for the SBC Retail comparison.

<u>February/March/April 2003 Orders Volume versus Installed Base</u>			
	Order Count from PM 59	Installed Circuit Count from PM 65	Ratio Circuits: Lines
UNE BRI Loops Feb.	337	10171	0.033
UNE BRI Loops Mar.	385	10168	0.038
UNE BRI Loops April	425	10251	0.041
Retail ISDN BRI Feb.	386	69479	0.005
Retail ISDN BRI Mar.	343	68128	0.005
Retail ISDN BRI April	391	67045	0.006

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ratio 6.6 times greater Feb. ratio 7.6 times greater Mar. ratio 6.8 times greater April

2. The corrective actions being taken for each of those PMs:

2.1. PM 65-06BRI loop with test access: Even though the issue described above impacts these results, SBC Illinois has taken corrective action to reduce the trouble report rate by focusing on both the provisioning and maintenance process. A team has been set up to evaluate troubles caused by improper installations (I-cases) with emphasis placed on identifying deviations from existing methods and procedures.

2.2. Performance Measure 59-06 for I cases has achieved parity each of the last three months for UNE BRI.

<u>PM</u>	<u>Month</u>	<u>CLEC</u>	<u>AIT</u>	<u>Z-Value</u>	<u>Result</u>	<u>Troubles</u>
59-06	February, 2003	5.53	8.81	-1.14	YES	22
59-06	March, 2003	8.05	11.95	-1.76	YES	31
59-06	April, 2003	7.76	8.95	-0.61	YES	33

2.3. Performance Measure 69-06 for Repeat Reports has achieved parity each of the last three months for UNE BRI

<u>PM</u>	<u>Month</u>	<u>CLEC</u>	<u>AIT</u>	<u>Z-Value</u>	<u>Result</u>	<u>Troubles</u>
69-06	February, 2003	14.91	17.36	-0.62	YES	17
69-06	March, 2003	14.81	17.21	-0.61	YES	16
69-06	April, 2003	9.35	19.15	-2.43	YES	10

2.4. Performance Measure 65.1-06 Report Rate Net I cases and Repeats has achieved parity two of the last three months for UNE BRI

<u>PM</u>	<u>Month</u>	<u>CLEC</u>	<u>AIT</u>	<u>Z-Value</u>	<u>Result</u>	<u>Troubles</u>
65.1-06	February, 2003	0.82	0.47	4.53	NO	83
65.1-06	March, 2003	0.60	0.58	0.30	YES	61
65.1-06	April, 2003	0.62	0.57	0.66	YES	64

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The miss in February was due to two bad plug-in cards, which accounted for 25% of the troubles. The Network Team assembled in March is on stand-by to investigate any misses to the above three measures

2.5. PM 65-03 DSL loops – line sharing: For the November results posted on December 20, 2002 corrective action to change the PM implementation was taken: the data sourcing was corrected and the results were subsequently restated for the months June thru October 2002. After review of the results in December, the Network Teams had a clear vision on the level of disparity and are working to improve performance in the following ways:

- Weekly conference calls with the management team on repair commitment performance
- New daily reports showing performance levels on the affected measures and processes
- Re-training of technicians on proper installation and repair procedures
- Development of job aids for those technicians
- Quality check of SBC splitter equipment in central offices
- Quality reviews check of workmanship
- New checklist completed on each non-ASI order by technician
- Managers in turn follow up with their own check list to verify the technician work

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- 2.6. Since this PM includes the ICASE trouble reports the central office team has implemented a remote test prior to due date to identify any miss wiring that may have happened during the provisioning of the Lineshare, this testing will assist in reducing the number of troubles coming in immediately after completion of the service order.
 - 2.7. PM65-08, DS1 loop with test access: As with the BRI submeasure, a team was established the week of March 31st to evaluate troubles caused by improper installations, with emphasis placed on validating installation test documentation to ensure the proper tests are being performed.
 - 2.8. The team found the trouble report rate for DS1 Loops to be overstated. This was due to the inclusion of Enhanced Extended Loops (EELs) trouble reports in the DS1 Loop disaggregation prior to the separate reporting of EELs effective with April 2003 results reported in May 2003. April results show the EEL services in their own disaggregation. With these EEL troubles out of the DS1 measure PM65-08 is in parity for April. SBC Illinois expects parity performance on trouble report rate for DS1 Loops to continue.
3. The schedule for those corrective actions to be completed:
- 3.1. PM 65-06, BRI loop with test access: Team was formed the week of March 31. Team meets two days a week on departmental conference call to research issues with trouble report rate performance.
 - 3.2. PM 65-03, DSL loops – line sharing: The corrective action process was implemented in February 2003, and continues, focusing on central office work. Team meets two days a week on departmental conference call to research issues with trouble report rate performance.
 - 3.3. PM 65-08, DS1 loop with test access: Team was formed the week of March 31. Team determined that the reporting of EELs in a separate disaggregation identified that DS1 Loop trouble report rate was in parity.

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4. The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 65-03				
February	22522	.58	.22	No
March	23588	.47	.21	No
April	23899	.39	.26	No
PM 65-06				
February	10171	1.12	.62	No
March	10168	1.06	.77	No
April	10251	1.04	.77	No
PM 65-08				
February	3750	3.17	1.68	No
March	3923	5.43	1.99	No
April	4477	2.28	2.06	Yes